

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

In re: SADIE B. PEREZ, : **CHAPTER13**
Debtor : **BANKRUPTCY NO. 18-10107**

DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS

The Debtor has not delayed in the prosecution of this case, which was filed pro se in January, 2018. She has entered into Stipulations with both of her mortgagees. She has also objected to the claims of the City of Philadelphia, which rendered her plan infeasible. Hearings on the Second Amended Objections to the City's claims are scheduled on November 6, 2018.

WHEREFORE, the Debtor requests that the Trustee's Motion to Dismiss this case should be denied.

Date: November 4, 2018

Attorney for Debtor

/s/DAVID A. SCHOLL
512 Hoffman Street
Philadelphia, PA. 19148
610-550-1765